

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

TYLER DIVISION

STRAGENT, LLC, *et al.*,

Plaintiffs,

v.

AUDI AG, *et al.*,

Defendants.

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CIVIL ACTION NO. 6:10-CV-227-LED

JURY TRIAL DEMANDED

NOTICE OF SETTLEMENT AND AGREED MOTION TO STAY

Plaintiffs Stragent, LLC and SeeSaw Foundation file this agreed motion requesting that all activities with respect to Defendants Bayerische Motoren Werke AG, BMW of North America, LLC, and BMW Manufacturing Co., LLC be stayed until September 13, 2011. The Parties have reached an oral agreement to settle this case, and are diligently working towards a written settlement agreement that is acceptable to the Parties. Consequently, Plaintiffs request this time to finalize the settlement agreement. Therefore, Plaintiffs respectfully request this stay of all deadlines up to and including September 13, 2011.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by electronic mail on this the 11th day of August 2011.

A handwritten signature in black ink, appearing to read "Eric M. Albritton", written over a horizontal line.

Eric M. Albritton